

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Dominion – Elizabeth River CT Station
2837 S Military Hwy,
Chesapeake, VA
Permit No. TRO-61108

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dominion Generation, Inc. has applied for a Title V Operating Permit for its Elizabeth River CT Station in Chesapeake. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____

Date: _____

Air Permit Manager: _____

Date: _____

Deputy Regional Director: _____

Date: _____

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I. Facility Information

Permittee Information

Dominion Generation
5000 Dominion Blvd.
Glen Allen, VA 23060

Responsible Official

Mr. O. Preston Sloane
Station Director

Acid Rain Designated Representative and NO_x Budget Trading Authorized Account Representative

Mr. J. David Rives, P.E.
Vice President, Fossil & Hydro
USEPA ATS-AAR ID number: 2099

Facility ID

Dominion – Elizabeth River CT Station
2837 South Military Hwy,
Chesapeake, VA 23323-0286

Facility Contact person

D. Scott Morelen
(757) 719-1134

County-Plant Identification Number: 51-550-00161

ORIS Code: 52087

NATS Facility Identification Number: 05208700CTZ1-CTZ3

Facility Description: SIC Code: 4911, **NAICS Code:** 221112

This facility is an electric generation facility using three simple cycle gas combustion turbines, and associated support equipment. The turbines are low mass emissions (LME) units as defined in 40 CFR 72.2 (actual emissions below 50 tons NO_x per control period, and 100 tons NO_x per year). As specified in 40 CFR 75.19, the turbines use optional NO_x emission estimation procedures in lieu of continuous NO_x emissions monitoring systems to determine NO_x emissions. The facility became subject to the Acid Rain program when it was purchased by Virginia Electric and Power Company (Dominion) on November 30, 2004.

The facility is a Title V major source for NO_x, SO₂, CO and H₂SO₄. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under a PSD Permit which was originally issued in 1991. The PSD permit is currently being amended and is being concurrently public noticed with this Title V Permit.

II. REQUESTED MODIFICATION

Virginia Electric and Power Company also known as Dominion completed the purchase of Commonwealth Atlantic Limited Partnership on November 30, 2004. Dominion has changed the name of this facility to Dominion – Elizabeth River CT Station. On December 3, 2004, the Department was notified that as a result of the purchase, this facility lost its status as an independent power producer and its exemption from the Acid Rain Program. The Department received an Acid Rain Application with the notification. This significant modification to the Title V permit is as a result of Dominion reviewing the conditions in the 1991 PSD permit and requesting changes to the permit to be more in line with other Dominion permits as well as adding the Acid Rain conditions. The PSD permit has been amended and will be public noticed concurrently with this permit. The changes to the permit include the following: changing the name of the owner and the facility on the permit, adding the Acid Rain conditions; and updating the Title V to match the changes made to the PSD permit.

III. CHANGES TO TITLE V OPERATING PERMIT

Summary of changes made to the PSD permit:

Condition 1 – added new boilerplate language and incorporated old conditions I.2 & II.10, deleted old condition I.1 as no longer needed.

Condition 2 was added to define Natural gas.

Condition 3 & 4 were added at request of facility to define what the terms startup and shutdown mean.

Condition 5 is old condition I.3 with the rated capacity added.

Condition 6 is old condition I.4 – this condition now references the allowed load ranges and better defines when water injection must take place.

Old condition I.5 and 6 were deleted because they were not practically enforceable.

Condition 7 is old condition I.18, which has been changed to reflect the changes in the NSPS GG language.

Condition 8 (old condition 7) has been changed to reflect that one of the turbines cannot meet the emission limit requirements at 75% load, but can still meet them at 85%. Facility requested that all the turbines have the same operating range.

Condition 9 was added to restrict when the inlet air fogging/cooling system can be operated.

Conditions 10 & 11 (old conditions I.8 & 15) are the same except for new boilerplate language and the removal of the Grade 76 reference. This is no longer needed.

Conditions 12, 13, are the updated language for old conditions I.9, 16 and 17.

Condition 14 relaxes old condition I.17 monitoring as requested by facility. NSPS requirements have also been added.

Conditions 15, 16 and 17 are the updated language for old conditions I.10, 11, and 12.

Condition 18 is the updated language for old condition I.13.

Condition 19 has been added at the request of the facility. This sets limits on how often a VEO must be performed and that any observations must be logged.

Condition 20 has been added to incorporate NSPS Subpart GG by reference.

Condition 21 is the updated frequency and language for old condition I.14.

Condition 22 has been added to test a previously installed inlet air fogging system for compliance to CO emission limits.

Condition 23 is the updated language for old condition II.4.

Condition 24 is the updated language for recordkeeping replacing old conditions I.19, 20 and II.6. VEO records, turbine load records, and fuel throughput records have been added.

Old condition I.21 has been deleted because it is no longer necessary.

Condition 25 is the new frequency and new language for old condition I.22. The NSPS language had been added to this condition for clarification.

Old conditions II.1, 3 and 5 have been deleted since they have been completed and parts of II.2 have also been deleted.

Condition 26 is the updated language for old condition II.2 with the completed notification removed. The remainder of the conditions are general conditions and have been updated to the new boilerplate language.

Additional Changes to the Title V permit include the addition of Section VI for the Acid Rain Conditions that are now applicable. The above ground storage tank listed in the last version of the permit has been removed because it does not belong to Dominion, it belongs to IMTT. Dominion will get their oil from the tank and will sample the tank as required in the permit.

IV. PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Virginian Pilot from October 10, 2005 to November 8, 2005.